

**Annual 47 C.F.R. §64.2009(e)**  
**OFFICER'S CERTIFICATION OF CUSTOMER PROPRIETARY  
NETWORK INFORMATION (CPNI) COMPLIANCE**

**EB Docket No. 06-36**

**COMPANY NAME:** Alianza Global Communication Services, LLC

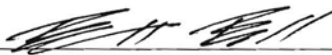
**FILER ID:** 862973

**OFFICER:** B. Scott Bell

**TITLE:** Chief Technology Officer

I, B. Scott Bell, hereby certify that I am an officer of Alianza Global Communication Services, LLC. ("Alianza") and that I am authorized to make this certification on behalf of Alianza. I have personal knowledge of Alianza's operating procedures and certify that, to the best of my knowledge, information and belief, Alianza's operating procedures are adequate to ensure compliance with the Commission's rules governing Customer Proprietary Network Information ("CPNI"), to the extent that such rules apply to Alianza or to any of the information obtained by Alianza. *See* 47 C.P.R. Subpart U.

Attached to this certification as Exhibit A is an accompanying statement explaining the procedures Alianza employs to ensure that it complies with the requirements set forth in §64.2001 et seq. of the Commission's rules, to the extent that such requirements apply to Alianza or to the information obtained by Alianza.

  
\_\_\_\_\_  
B. Scott Bell  
Chief Technology Officer

28 FEB 2011  
\_\_\_\_\_  
Date

**Exhibit A**  
**Statement of CPNI Procedures and Compliance**

**Alianza Global Communication Services, LLC.**  
**Statement of CPNI Procedures and Compliance**

Alianza Global Communication Services, LLC. ("Alianza") main business focus is the provisioning of Voice over Internet Protocol ("VoIP") services on a wholesale basis. It has no end-user customers. Consequently, Alianza does not have a "subscriber" relationship with its customers and does not send "bills" to end-user customers. Alianza does not offer or market its services to the public or to such classes of users as to be effectively available directly to the public. The company provides service only to Interconnected VoIP Service Providers.

Alianza may obtain certain call detail information concerning the calls routed through its VoIP Platform. Because Alianza provides exclusively wholesale services, it does not use any call detail information that it obtains to attempt to market telecommunications services to the general public or any end-user customers.

Moreover, the call detail information obtained by Alianza is not made available to third parties over the telephone, online, or in retail stores. However, such information may be disclosed: (a) in response to a proper subpoena, court order or other judicial process; or (b) to the transmitting or receiving carriers for billing-relating purposes.

Alianza safeguards the call detail information that Alianza obtains from improper use or disclosure by employees in providing its services. Access to call detail information is limited to certain employees, and those employees are trained to protect call detail information from improper use or disclosure and informed that failure to protect that information will result in appropriate disciplinary action. In addition, Alianza has programs and procedures in place to discover and protect against attempts by third parties to gain unauthorized access to Alianza computers and call detail records. In the event of unauthorized CPNI access, Alianza will notify the requisite law enforcement agencies, and the customer when possible.

Alianza did not have any breach of its call detail records during the past year, nor has the company received any customer complaints in the past year concerning the unauthorized release of or access to CPNI. Alianza has processes and procedures in place to maintain records of any security breaches and to notify affected carriers and law enforcement of such breaches.